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January 27, 2023

Via ECF

Hon. Lee G. Dunst, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Agudelo v. Recovco Mortgage Management LLC et al.*, No. 22 Civ. 4004
Request for Settlement Conference

Dear Judge Dunst:

The parties write pursuant Your Honor's Individual Practice Rule 5(A) to request an in-person settlement conference on February 1, 2023. The parties have made significant progress in settlement negotiations but have concluded that they require the Court's assistance. Per defense counsel's representations, time is of the essence as other prospective creditors of corporate defendants are close to obtaining judgments, and funds in those entities are limited.

Although the parties are mindful of the Court's Individual Practice Rule 5(C) requiring submissions at least seven business days in advance of the conference, should the court agree to hold a settlement conference on February 1, the parties respectfully request to provide their submissions to the Court no later than 2 pm on Monday, January 30.

Finally, the parties request that counsel for the California class actions be permitted to appear by phone if they so wish, as any settlement will cover those matters as well.

Respectfully submitted,

/s/

Scott Simpson

cc: All counsel (by ECF)